

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

| | | |
|---------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 5:20 CR 297 |
| |) | |
| Plaintiff, |) | Judge Donald Nugent |
| |) | |
| v. |) | <u>DEFENDANT'S RULE 16(a)</u> |
| |) | <u>DEMAND FOR DISCOVERY AND</u> |
| MATTHEW P. SLATZER, |) | <u>INSPECTION</u> |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |
| |) | |

Pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure, counsel for Defendant requests that the following information be made available for inspection, and that copies be provided thereof:

1. Any statement of whatever kind or description within the possession of the government made by the defendant and any co-defendants.

2. Written summaries of any and all oral statements made by defendant or any co-defendant subsequent to the time of being placed in custody.

3. All recorded testimony made of the defendant or any of the co-defendants before the Grand Jury which relates to the offense charged.

4. A history of defendant's past criminal records.

5. All books, papers, documents, photographs, recordings, tangible objects or copies thereof available to or within the possession, custody or control of the government, and which are material to the preparation of the defense, or are intended for use by the United States Attorney as evidence at the trial, or were obtained from or belong to the defendant.

6. Any results or reports of physical or mental examinations and of scientific tests or experiments, made in connection with this case, or copies thereof, available to or within the possession, custody or control of the government, the existence of which is known or through the exercise of due diligence may become known to the United States Attorney.

7. A written list of the names and addresses of all witnesses whom the United States Attorney intends to call at trial, together with any record of prior felony convictions of any such witness, which record is within the knowledge of the United States Attorney.

8. All material now known to the government, or which may be known, or which through due diligence may be learned from the investigating officers or the witnesses in the case, which is either exculpatory in nature or favorable to the accused or which may lead to exculpatory material. This request includes the reports of any investigations carried out by the FBI, DEA, IRS, ATF or local police and/or other law enforcement agencies of suspects other than the defendant.

9. Copies of all statements by any witnesses signed or unsigned, acquired by whatever form, and material to and bearing on the merits of this case; including, but not limited to, the statements of the investigating officers, whether State or Federal officers, and which are in the custody and/or control of the Prosecuting Attorney or his staff, or subject to and available at his discretion or order, or at the direction or order of his staff or agents.

10. The precise nature and conditions of any and all promises, considerations, agreements and/or inducements of any description; and of any discussions held or made between any state witness and the Prosecuting Attorney, police officials, and/or any state or government officials, which might tend to influence that witness's testimony at trial.

PLEASE TAKE FURTHER NOTICE THAT:

1. The materials enumerated in this demand shall be produced for examination as provided for in Rule 16 of the Federal Rules of Civil Procedure at a mutually agreeable time and date at the Cleveland offices of United States Attorney for the Northern District of Ohio.
2. Upon failure to comply with the terms of this demand, the defendant will move for an order compelling compliance and/or an order prohibiting the government from introducing the undisclosed evidence at trial.
3. If, prior to or during trial, the government discovers additional evidence or material previously requested or ordered, which is subject to discovery or inspection under this rule, the government shall promptly notify the attorney for the above named defendant of the existence of this

additional evidence or material.

Respectfully submitted,

s/Anthony J. Vegh
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Counsel for Defendant

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically served on this 16th day of June, 2020. Notice of this filing will be sent to all counsel indicated on the electronic receipt by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Anthony J. Vegh